

STATE OF VERMONT  
PUBLIC UTILITY COMMISSION

Case No. 22-0604-INV

Renewable Energy Standard compliance for program year 2021	
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Order entered: 12/28/2022

**ORDER APPROVING 2021 VERMONT RENEWABLE ENERGY STANDARD  
COMPLIANCE FILINGS**

This case concerns Vermont’s Renewable Energy Standard (“RES”), which is implemented by the Vermont Public Utility Commission (“Commission”) through Commission Rule 4.400, the Renewable Energy Standard Rule (“RES Rule”). Pursuant to Act 56 of 2015, the Renewable Energy Standard requires Vermont’s electric distribution utilities to acquire increasing amounts of renewable energy and achieve fossil-fuel savings through energy transformation projects.

The RES Rule directs the utilities to make annual filings with the Commission to demonstrate their compliance with the RES.<sup>1</sup> In this Order, the Commission adopts the hearing officer’s proposal for decision, approves the utilities’ 2021 RES compliance filings, and closes this proceeding.

**PROPOSAL FOR DECISION**

**I. BACKGROUND**

The RES was established by the Vermont General Assembly pursuant to Public Act No. 56 of 2015. Act 56 requires utilities to acquire specified amounts of renewable energy, in the form of tradeable renewable energy credits (“RECs”) or environmental attributes (“attributes”), and to achieve fossil-fuel savings from energy transformation projects, which may include programs such as supporting the weatherization of buildings and encouraging the purchase and use of electric vehicles and electric heating systems.<sup>2</sup>

The RES is divided into three categories, or tiers.

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<sup>1</sup> Commission Rule 4.419(a) and (b).

<sup>2</sup> 30 V.S.A. § 8005.

Tier I requires utilities to procure an amount of renewable energy equivalent to 55% of their annual retail electric sales for the year 2017, increasing by 4% every third January 1 thereafter, eventually reaching 75% in 2032.<sup>3</sup> For 2021, the Tier I requirement is 59%.

Tier II, which serves to help satisfy the overarching Tier I requirement, requires utilities to procure an amount of renewable energy equivalent to 1% of their 2017 annual retail sales from distributed generation resources,<sup>4</sup> increasing by three-fifths of a percent each year thereafter, eventually reaching 10% in 2032.<sup>5</sup> For 2021, the Tier II requirement is 3.4%.

Tier III requires utilities, except for municipal utilities serving not more than 6,000 customers, to procure additional renewable distributed generation eligible for Tier II or acquire fossil-fuel savings from energy transformation projects equivalent to 2% of their annual retail sales in 2017, increasing by two-thirds of a percent each year thereafter, eventually reaching 12% in 2032.<sup>6</sup> For 2021, the Tier III requirement for these utilities is 4 2/3%. For municipal utilities serving not more than 6,000 customers, the required amount for Tier III is 2% of the utility's annual retail sales beginning on January 1, 2019, increasing by an additional two-thirds of a percent each subsequent January 1 until reaching 10 2/3% on and after January 1, 2032.<sup>7</sup> For 2021, the Tier III requirement for municipal utilities serving not more than 6,000 customers is 3 1/3%.

To demonstrate compliance with Tiers I and II of the RES, a utility must own and retire tradeable RECs accounted for in the New England Power Pool Generation Information System, known as "NEPOOL GIS,"<sup>8</sup> and must provide the Commission with documentation of its ownership and retirement of tradeable RECs through submittal of a completed compliance spreadsheet.<sup>9</sup> If a utility wishes to demonstrate compliance with Tiers I and II of the RES

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<sup>3</sup> 30 V.S.A. § 8005(a)(1)(B).

<sup>4</sup> Distributed generation resources must be renewable, have a nameplate capacity of 5 MW or less, be connected to the Vermont distribution or transmission system, and have been commissioned after June 30, 2015, or been approved under 30 V.S.A. § 219a. 30 V.S.A. § 8005(a)(2)(B).

<sup>5</sup> 30 V.S.A. § 8005(a)(2)(C). A utility meeting the 100% renewable requirements of 30 V.S.A. § 8005(b) may satisfy the Tier II requirements by accepting net-metering systems within its service territory pursuant to the provisions of Title 30 of the Vermont Statutes Annotated that govern net-metering. 30 V.S.A. § 8005(b)(2)(A).

<sup>6</sup> 30 V.S.A. § 8005(a)(3)(B).

<sup>7</sup> 30 V.S.A. § 8005(a)(3)(B).

<sup>8</sup> NEPOOL GIS issues and tracks certificates for all MWh of generation and load produced in the ISO New England control area, as well as imported MWh from adjacent control areas. See <https://www.nepoolgis.com/> for additional information.

<sup>9</sup> Commission Rules 4.405(c) and 4.419(a) and (b).

through tradeable RECs or attributes that cannot be certified as Tier I or Tier II tradeable RECs in NEPOOL GIS, that are from a control area that lacks a GIS system integrated with NEPOOL GIS, or for which the renewable content is not accurately represented on its NEPOOL GIS certificates, the utility may do so in accordance with the specific requirements of the RES Rule.<sup>10</sup>

As for Tier III, if a utility chooses to comply with Tier III of the RES through implementation of energy transformation projects, rather than through procurement and retirement of additional Tier II tradeable RECs or attributes, the utility must show the fossil-fuel savings from its Tier III projects in accordance with the requirements of the RES Rule.<sup>11</sup>

Under the RES Rule, utilities must annually submit reports regarding their Tier III savings claims no later than March 15 and compliance filings demonstrating compliance with all three tiers of the RES no later than August 31.<sup>12</sup> For purposes of compliance with the requirements of the RES for 2021, the utilities were required to submit their Tier III reports by March 15, 2022, and their RES compliance filings by August 31, 2022.

Utilities that fail to comply with the RES requirements may be subject to an alternative compliance payment. For 2021 the alternative compliance rates are: Tier I - \$10.70/MWh, Tier II - \$64.18/MWh, and Tier III - \$64.18/MWh.<sup>13</sup>

## **II. PROCEDURAL HISTORY**

Between March 11, 2022, and October 28, 2022, the following utilities and entities made a series of compliance filings: Green Mountain Power Corporation (“GMP”), Vermont Electric Cooperative, Inc. (“VEC”), Washington Electric Cooperative, Inc. (“WEC”), the City of Burlington Electric Department (“BED”), the Vermont Public Power Supply Authority (“VPPSA”) on behalf of its member utilities,<sup>14</sup> the Town of Stowe Electric Department (“Stowe Electric”), and the Village of Hyde Park Electric Department (“Hyde Park Electric”).

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<sup>10</sup> Commission Rule 4.404(b).

<sup>11</sup> Commission Rules 4.408-4.418.

<sup>12</sup> Commission Rules 4.412(4) and 4.419(a).

<sup>13</sup> 30 V.S.A. § 8005(a)(4); *Order Setting Renewable Energy Standard Alternative Compliance Payment Rates for 2021*, Case No. 20-2367-INV, Order of 8/27/2020 at 1.

<sup>14</sup> The VPPSA member utilities include: Barton Village, Inc. Electric Department; Village of Enosburg Falls Water & Light Department Inc.; Town of Hardwick Electric Department; Village of Jacksonville Electric Company; Village of Johnson Water & Light Department.; Village of Ludlow Electric Light Department; Village of Lyndonville Electric Department; Village of Morrisville Water & Light Department; Town of Northfield Electric

On June 1, 2022, the Vermont Department of Public Service (“Department”) submitted analyses of the utilities’ required March 2022 filings in which the Department evaluated and verified the utilities’ Tier III compliance filings.

On June 15, 2022, GMP filed a letter stating that it agreed with the Department’s calculations.

On October 7, 2022, the Department submitted analyses of the utilities’ required August 2022 filings, in which the Department verified all the utilities’ RES compliance in 2021 for all three Tiers of the RES.<sup>15</sup> In its comments, the Department noted four corrections:

- GMP listed its Tier III obligation as 136 MWhe higher than required, and the Department recommends that GMP adjust its 2022 Tier III banking to account for the extra credits that GMP retired.<sup>16</sup>
- For the second year, VEC miscalculated the annual increase of two-thirds of a percent for its Tier III obligation. The Department noted that due to this miscalculation, VEC listed its Tier III obligation as 21,280 MWhe instead of the correct amount of 21,252 MWhe and retired 15 more credits than necessary.<sup>17</sup> The Department recommends that the Commission use the 21,252 MWhe as VEC’s 2021 obligation and that VEC adjust its Tier III banking in 2022 to account for the excess Tier III credits retired.
- In its Tier III savings claim filing, VPPSA reported its Tier III obligation as 11,543 MWhe. However, in its RES compliance report, VPPSA reported its Tier III obligation as 11,575 MWhe. The Department uses the MWh sales figure reported in the RES compliance report to determine compliance with the RES. The Department confirmed that VPPSA banked the correct number of credits based on its updated obligation of 11,575 MWhe.<sup>18</sup>

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Department; Village of Orleans Electric Department; and Swanton Village, Inc. Electric Department (“Swanton Electric”).

<sup>15</sup> *Department Comments*, Case No. 22-0604-INV, filed on 10/7/2022 (“*Department Comments*”).

<sup>16</sup> *Id.* at 8-9.

<sup>17</sup> *Id.* at 10-11.

<sup>18</sup> *Id.* at 11-12.

- WEC's Tier III obligation was listed as 3,335 MWh in its Tier III verification report and 3,337 MWh in its compliance report, an increase of two credits. The Department uses the MWh sales figure reported in the RES compliance report to determine compliance with the RES. The Department confirmed that WEC banked the correct number of credits based on its updated obligation of 3,337 MWh.<sup>19</sup>

On October 17, 2022, I issued a procedural order requesting that some utilities update and re-file their compliance spreadsheets with additional information.

From October 21, 2022, to October 28, 2022, the utilities filed revised reports.

On November 14, 2022, the Department filed reply comments stating it had reviewed the revised spreadsheets and had no further comments.

### **III. RES COMPLIANCE FILINGS**

Each utility demonstrated compliance with its 2021 RES requirements by filing the appropriate documentation, including a Tier III compliance report, a completed compliance spreadsheet, and attestations, if applicable.

#### **Burlington Electric Department**

BED's RES requirements for 2021 were as follows: Tier I – 187,923 MWh; Tier II – 0 MWh (because BED qualifies as 100% renewable and accepts net-metering systems); and Tier III – 14,864 MWh.<sup>20</sup>

In 2021, to qualify as 100% renewable, BED retired 326,677 Tier I RECs, which exceeded its Tier I requirement, and banked 526,138 Tier I RECs for use in future years.<sup>21</sup>

BED is exempt from Tier II because it (1) is 100% renewable based on its retirement of Tier I RECs, and (2) continues to offer net-metering to customers within its service territory.

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<sup>19</sup> *Id.* at 13.

<sup>20</sup> *BED Revised RES Spreadsheet*, Case No. 22-0604-INV, filed on 10/24/2022, at Summary Sheet. BED clarified in a cover letter to its August 30, 2022, RES Compliance Filing that its MWh sales numbers differed from what it filed in its Tier III savings claim filing. These obligations are correct.

<sup>21</sup> *Id.*

Finally, BED met its Tier III obligation by achieving 49,976 MWhe of energy savings from its Tier III energy transformation projects.<sup>22</sup> BED has a bank of 35,112 Tier III credits for use in future years.<sup>23</sup>

Given the above, the Department found that BED complied with the RES for 2021.<sup>24</sup>

### Green Mountain Power

GMP's RES requirements for 2021 were as follows: Tier I – 2,419,297 MWh; Tier II – 139,417 MWh; and Tier III – 191,357 MWhe.<sup>25</sup>

In 2021, GMP exceeded its RES Tier I requirement by retiring 3,231,458 Tier I RECs, which is equal to approximately 79% of its retail sales.<sup>26</sup> GMP retired additional RECs under Tier I to meet its self-imposed renewable energy goals. GMP also banked 2,439,885 Tier I RECs for compliance in future years.<sup>27</sup>

GMP met its Tier II obligation by retiring 139,417 Tier II RECs. GMP banked no Tier II RECs for compliance in future years.<sup>28</sup>

Finally, GMP achieved 316,550 MWhe of energy savings from Tier III energy transformation projects to meet its 2021 Tier III obligation of 191,357 MWhe.<sup>29</sup> GMP now has a bank of 390,646 Tier III credits for use in future years.

Given the above, the Department found that GMP complied with the RES for 2021.<sup>30</sup>

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<sup>22</sup> *Id.*

<sup>23</sup> *Id.*

<sup>24</sup> *Department Comments* at 8.

<sup>25</sup> 2022-10-28 GMP Response to PUC Order Requesting Updated Spreadsheets, Case No. 22-0604-INV, filed on 10/28/2022, at Summary Sheet. GMP's Tier III obligation was 191,357 MWhe, not 191,493 MWhe listed in its spreadsheet. *Department Comments* at 8-9.

<sup>26</sup> *Id.*

<sup>27</sup> *Id.*

<sup>28</sup> *Id.*

<sup>29</sup> *Id.* GMP retired 191,493 credits, which is 136 credits more than it was required to retire. The Department recommends that GMP account for these additional 136 credits within its 2022 Tier III banking.

<sup>30</sup> *Department Comments* at 9.

Hyde Park Electric Department

Hyde Park Electric's RES requirements for 2021 were as follows: Tier I – 7,341 MWh; Tier II – 423 MWh; and Tier III – 415 MWhe.<sup>31</sup>

In 2021, Hyde Park Electric met its RES Tier I obligation by retiring 7,341 Tier I RECs. Hyde Park Electric banked 39 Tier I RECs for use in future years.<sup>32</sup>

Hyde Park Electric met its Tier II obligation by retiring 423 Tier II RECs. Hyde Park Electric also banked 2,251 Tier II RECs for use in future years.<sup>33</sup>

Hyde Park Electric met its Tier III obligation by retiring 415 Tier II RECs. Hyde Park Electric banked no Tier III credits for use in future years.<sup>34</sup>

Given the above, the Department found that Hyde Park Electric complied with the RES for 2021.<sup>35</sup>

Stowe Electric Department

Stowe Electric's RES requirements for 2021 were as follows: Tier I – 45,476 MWh; Tier II – 2,621 MWh; and Tier III – 2,569 MWhe.<sup>36</sup>

In 2021, Stowe Electric met its Tier I obligation by retiring 45,476 Tier I RECs. Stowe Electric banked 15,423 Tier I RECs for use in future years.<sup>37</sup>

Additionally, Stowe Electric met its Tier II obligation by retiring 2,621 Tier II RECs. Stowe Electric banked 2,717 Tier II RECs for use in future years.<sup>38</sup>

Stowe Electric met its Tier III obligation by achieving 5,790 MWhe from energy transformation projects. Stowe Electric now has a bank of 3,294 Tier III credits for use in future years.<sup>39</sup>

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<sup>31</sup> *Hyde Park Electric RES 2021 Compliance Spreadsheet*, Case No. 22-0604-INV, filed on 8/1/22, at Summary Sheet.

<sup>32</sup> *Id.*

<sup>33</sup> *Id.*

<sup>34</sup> *Id.*

<sup>35</sup> *Department Comments* at 10.

<sup>36</sup> *Stowe Revised 2021 RES Compliance Filing*, Case No. 22-0604-INV, filed on 10/26/2022, at Summary Sheet.

<sup>37</sup> *Id.*

<sup>38</sup> *Id.*

<sup>39</sup> *Id.*; *Department Comments* at 10.

Given the above, the Department found that Stowe Electric complied with the RES for 2021.<sup>40</sup>

#### Vermont Electric Cooperative

VEC's RES requirements for 2021 were as follows: Tier I – 268,687 MWh; Tier II – 15,484 MWh; and Tier III – 21,252 MWh.<sup>41</sup>

In 2021, VEC met its Tier I requirement by retiring 268,687 Tier I RECs. VEC banked 8,440 Tier I RECs for compliance in future years.<sup>42</sup>

Regarding its Tier II obligation, VEC met that obligation by retiring 15,484 Tier II RECs. VEC banked 3,045 Tier II RECs for compliance in future years.<sup>43</sup>

VEC achieved 39,394 MWh from Tier III energy transformation projects to satisfy its Tier III obligation of 21,252 MWh for 2021.<sup>44</sup> VEC now has a bank of 41,877 Tier III credits for use in future years.<sup>45</sup>

Given the above, the Department found that VEC complied with the RES for 2021.<sup>46</sup>

#### Vermont Public Power Supply Authority

VPPSA reports on its members' RES compliance in the aggregate. Swanton Electric is 100% renewable, which makes VPPSA's reporting somewhat different from and more complicated than it is for other entities. VPPSA filed sufficient documentation with which to establish that its members achieved their 2021 RES goals.<sup>47</sup>

Including Swanton Electric, VPPSA members' RES requirements for 2021 were as follows: Tier I – 226,434 MWh; Tier II – 10,019 MWh (excluding Swanton Electric because it is 100% renewable and accepts net-metering systems); and Tier III – 11,575 MWh.<sup>48</sup>

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<sup>40</sup> *Department Comments* at 10.

<sup>41</sup> *VEC Annual RES Compliance Report*, Case No. 22-0604-INV, filed on 10/21/2022, at Summary Sheet.

<sup>42</sup> *Id.*

<sup>43</sup> *Id.*

<sup>44</sup> *Id.* VEC retired 21,267 credits, which is 15 credits more than it was required to retire. The Department recommends that VEC account for these additional 15 credits within its 2022 Tier III banking. *Department Comments* at 10-11.

<sup>45</sup> *Id.*

<sup>46</sup> *Department Comments* at 11.

<sup>47</sup> *Id.*

<sup>48</sup> *VPPSA RES Revised*, Case No. 22-0604-INV, filed on 10/24/2022, at Summary Sheet.



In 2021, VPPSA members met their Tier I RES requirements by retiring 226,618 Tier I RECs, including an additional 21,554 Tier I RECs for Swanton Electric to be 100% renewable.<sup>49</sup> VPPSA members banked 33,368 Tier I RECs for use in future compliance years.<sup>50</sup>

For Tier II, VPPSA members met their Tier II obligations by retiring a total of 10,172 Tier II RECs.<sup>51</sup> Swanton retired 151 Tier II net-metering RECs as part of the total.<sup>52</sup> VPPSA also banked 5,139 Tier II RECs for future compliance.<sup>53</sup>

For Tier III, VPPSA members met their obligations by achieving 18,502 MWhe from Tier III energy transformation projects. VPPSA now has a bank of 18,833 Tier III credits for use in future years.<sup>54</sup>

Given the above, the Department found that VPPSA complied with the RES for 2021.<sup>55</sup>

#### Washington Electric Cooperative

WEC's RES requirements for 2021 were as follows: Tier I – 42,187 MWh; Tier II – 2,431 MWh, and Tier III – 3,337 MWhe.<sup>56</sup>

In 2021, to qualify as 100% renewable, WEC retired 76,601 Tier I RECs.<sup>57</sup> WEC banked 13,475 Tier I RECs for compliance in future years.<sup>58</sup>

Because WEC qualifies as 100% renewable and accepts net-metering systems, WEC is exempt from Tier II requirements. Nonetheless, WEC retired 2,431 net-metering RECs, which is the number of Tier II RECs it would need to retire if it were not 100% renewable. WEC also banked 765 Tier II RECs for use in future compliance years.

Regarding Tier III requirements, WEC achieved 5,509 MWhe from Tier III energy transformation projects and retired 2,660 Tier II RECs for purposes of Tier III compliance. WEC now has a bank of 5,667 Tier III credits for use in future compliance years.<sup>59</sup>

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<sup>49</sup> *Department Comments* at 11.

<sup>50</sup> *VPPSA RES Revised*, Case No. 22-0604-INV, filed on 10/24/2022, at Summary Sheet.

<sup>51</sup> *Id.*

<sup>52</sup> *Department Comments* at 11.

<sup>53</sup> *VPPSA RES Revised*, Case No. 22-0604-INV, filed on 10/24/2022, at Summary Sheet.

<sup>54</sup> *Id.*

<sup>55</sup> *Department Comments* at 12.

<sup>56</sup> *Id.* *WEC RES Compliance 2021 Revised*, Case No. 22-0604-INV, filed on 10/26/2022, at Summary Sheet.

<sup>57</sup> *Id.*

<sup>58</sup> *Id.*

<sup>59</sup> *Id.*

Given the above, the Department found that WEC complied with the RES for 2021.<sup>60</sup>

#### IV. DISCUSSION

##### RES Compliance

The Department's review of the utilities' compliance filings included its RES Tier III Verification Report filed on June 1, 2022, in which it provided its evaluation of the utilities' Tier III custom and prescriptive measures. For custom measures, the Department reviewed customer-specific energy usage data and operational information to verify the assumptions on which engineering analyses for the custom measures were based, and then reviewed the engineering analyses for reasonableness, accuracy, and compliance with statute.<sup>61</sup> For prescriptive measures, the Department reviewed a statistical sample of the measures and used the same verification process it uses to verify the Energy Efficiency Utilities' savings claims to verify the electric utilities' Tier III prescriptive measures.<sup>62</sup>

The Department's evaluation of the utilities' compliance filings also included a review of the utilities' retirement of Tier I and II RECs in NEPOOL GIS, as well as a review of the utilities' attestations certifying that attributes associated with the Quebec System Mix and the Niagara and St. Lawrence projects were eligible for Tier I and met the requirements of the RES.<sup>63</sup>

Given my review of the utilities' filings and the Department's review and comments, I find that the utilities have met their RES obligations for 2021. Therefore, I recommend that the Commission approve the utilities' filings and find that the utilities in this proceeding have met their RES obligations for the 2021 compliance year.

##### Tier III Low-Income Spending Reporting

In 2022, the Commission approved an updated data collection and compliance spreadsheet for RES reporting, which has improved tracking of utility spending on Tier III projects for low-income customers, including historic low-income spending.<sup>64</sup> Several of the

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<sup>60</sup> *Department Comments* at 13.

<sup>61</sup> RES Tier III Verification Report 2021 at 8.

<sup>62</sup> *Id.* at 8-9.

<sup>63</sup> *Department Comments* at 3-7.

<sup>64</sup> *Renewable Energy Standard 2022 Tier III Plans*, Case No. 21-4080-INV, Order of 3/16/2022.

utilities – GMP, WEC, and Stowe Electric – still need to include or correct data regarding their historic low-income spending. Because these data are for tracking long-term low-income spending, rather than being specific to the utilities’ 2021 RES compliance, I recommend that the Commission not wait for these data to issue its approval of the utilities’ 2021 RES compliance. I recommend that the Commission direct the utilities to respond to the following requests by January 31, 2023.

### GMP

GMP did not provide historical data on low-income spending for 2017-2018 because it “does not have a data set for prior years that would allow apples to apples reporting and comparisons of historic data for low-income equity spending” under the definition of low-income spending in the Commission’s 2022 order regarding the low-income equity spending benchmark.<sup>65</sup> In its initial order implementing the RES, the Commission determined that:

“[f]or the purposes of providing equitable opportunities to low-income customers to participate in and benefit from energy transformation projects, we conclude that DUs should assess eligibility based upon a definition that is consistent with the statewide EEU: Low-income households are those where the household income is at or below 80% of Vermont statewide median household income.”<sup>66</sup>

Accordingly, the low-income customer definition has been in place since the beginning of the RES program. GMP is asked to report any Tier III spending for 2017 and 2018 that GMP considered “low-income customer spending,” even if that spending does not conform exactly to the Commission’s definition of low-income spending.<sup>67</sup> If the information cannot be reported in the spreadsheet, please provide the data separately. If GMP is unable to report any Tier III low-income customer spending for these years, GMP should explain why not.

### WEC

WEC must update its Tier III Cumulative Impacts spreadsheet to include low-income spending data for 2017 and 2018 in Table 1. If WEC is unable to report this information, WEC should explain why not.

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<sup>65</sup> 2022-10-28 GMP Response to PUC Order Requesting Updated Spreadsheets, Case No. 22-0604-INV, filed on 10/28/2022, at 2; *Renewable Energy Standard 2022 Tier III Plans*, Case No. 21-4080-INV, Order of 3/16/2022.

<sup>66</sup> *Investigation re: establishment of the Renewable Energy Standard program*, Docket No. 8550, Order of 6/28/2016 at 36.

<sup>67</sup> If the reported Tier III low-income customer spending for 2017 and 2018 does not conform exactly to the Commission-approved definition, GMP should include an explanation of how it differs.

Additionally, WEC's Tier III Reporting Template spreadsheet, cell B55 titled "Low-Income Equity Benchmark," does not appear to follow the formula specified in Commission Rule 4.413 and Note 'r' of the spreadsheet. For future reporting years, WEC should update the spreadsheet using the applicable formula.

Stowe Electric

Stowe Electric appears to have a discrepancy across tabs in its spreadsheets. In Table 1 of the Tier III Cumulative Impacts spreadsheet, Stowe Electric should correct or explain the incongruent numbers from 2021 Gross Costs and the Gross Costs reported in the Tier III Reporting Template for each rate class. Also, in Table 1 of the Tier III Cumulative Impacts spreadsheet, Stowe Electric should update the formula in Cell L11 so that the calculation is based on 2021 data (i.e., Cell L7).

**V. CONCLUSION**

Given the discussion above, I recommend that the Commission find that the reporting utilities have each satisfied their RES 2021 requirements. I also recommend that the Commission direct GMP, WEC, and Stowe Electric to make compliance filings as described above by no later than January 31, 2023.

This Proposal for Decision has not been circulated to the parties pursuant to 3 V.S.A. § 811 because it is not adverse to any party.



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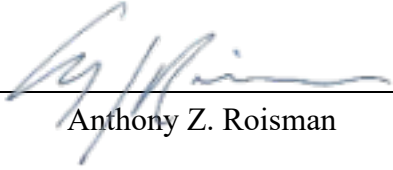
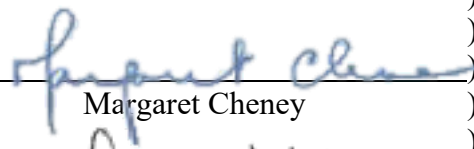
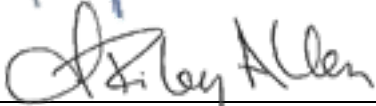
Kelly Martone  
Hearing Officer

**VI. ORDER**

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED by the Vermont Public Utility Commission (“Commission”) of the State of Vermont that:

1. The findings, conclusions, and recommendations of the Hearing Officer are adopted. All other findings proposed by parties, to the extent that they are inconsistent with this Order, were considered and not adopted.
2. In accordance with the information filed in this proceeding, the reporting utilities have each satisfied their Renewable Energy Standard 2021 requirements.
3. Green Mountain Power Corporation, Washington Electric Cooperative, Inc., and the Town of Stowe Electric Department are each directed to make compliance filings as described above by no later than January 31, 2023.

Dated at Montpelier, Vermont, this 28th day of December, 2022.

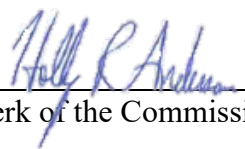
	)	
Anthony Z. Roisman	)	PUBLIC UTILITY
	)	
	)	
Margaret Cheney	)	COMMISSION
	)	
	)	OF VERMONT
J. Riley Allen	)	

OFFICE OF THE CLERK

December 28, 2022

Filed:

Attest:

  
Clerk of the Commission

*Notice to Readers: This decision is subject to revision of technical errors. Readers are requested to notify the Clerk of the Commission (by e-mail, telephone, or in writing) of any apparent errors, in order that any necessary corrections may be made. (E-mail address: [puc.clerk@vermont.gov](mailto:puc.clerk@vermont.gov)).*

*Appeal of this decision to the Supreme Court of Vermont must be filed with the Clerk of the Commission within 30 days. Appeal will not stay the effect of this Order, absent further order by this Commission or appropriate action by the Supreme Court of Vermont. Motions for reconsideration or stay, if any, must be filed with the Clerk of the Commission within 28 days of the date of this decision and Order.*

PUC Case No. 22-0604-INV - SERVICE LIST

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